

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

BROOKE RYAN, individually and on	)	
behalf of all others similarly situated,	)	
	)	
Plaintiff,	)	
	)	Case No.: 5:20-cv-02164
v.	)	
	)	
TEMPLE UNIVERSITY,	)	
	)	
Defendant.	)	
CHRISTINA FUSCA, on behalf herself	)	
and all others similarly situated,	)	
	)	
Plaintiff,	)	
	)	Case No.: 2:20-CV-03434
v.	)	
	)	
TEMPLE UNIVERSITY,	)	
	)	
Defendant.	)	
	)	

**PLAINTIFFS' JOINT MOTION TO CONSOLIDATE RELATED CASES AND  
APPOINT INTERIM CLASS COUNSEL**

Pursuant to Federal Rule of Civil Procedure 42(a), Plaintiff respectfully moves this court to consolidate two putative class action cases now pending in this district: *Ryan v. Temple University*, 5:20-cv-02164 and *Fusca v. Temple University*, 2:20-cv-03434. Plaintiffs further request that this Court select and appoint Anastopoulo Law Firm, LLC and Carlson Lynch, LLP as interim co-lead putative class counsel for Plaintiffs pursuant to Federal Rule of Civil Procedure 23(g)(3). In support of this Motion, Plaintiffs submit the accompanying Memorandum of Law.

Dated: August 12, 2020

Respectfully submitted,

**ANASTOPOULO LAW FIRM, LLC**

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-AND-

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**ATTORNEYS FOR PLAINTIFF FUSCA**

**LCvR 7(b) CERTIFICATION**

Counsel for Plaintiff has conferred with Defendant regarding this motion and Defendant does not oppose the relief sought, provided, however, that Defendant's consent is not deemed a waiver of any defenses Defendant might later assert, including Defendant's right to ultimately contest class certification. Plaintiff agrees that consolidation and appointment of interim Class Counsel does not serve to waive Defendant's ability to raise any and all available defenses to the action, including defenses to class certification, and the same has been reserved in the attached Proposed Order.

/s/ Eric M. Poulin  
Eric M. Poulin

**CERTIFICATE OF SERVICE**

I, Eric M. Poulin, hereby certify that on August 12, 2020 a true and correct copy of the foregoing Motion and accompanying Memorandum of Points and Authorities was served via the Court's electronic filing system to all counsel of record.

/s/ Eric M. Poulin

Eric M. Poulin